

The Vitamin Marketing Experts

3058 98 MAR 31 73.11

March 10, 1998

Dr. Elizabeth Yetley
Director of the Office of Special Nutritionals
Division of Programs and Enforcement Policy
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street HFS-455
Washington, D.C. 20204

Dear Dr. Yetley:

Notice is hereby given pursuant to the requirements of Section 403(r)(6)(21 U.S.C. 343(r)(6) of the Federal Food, Drug and Cosmetic Act of statements of nutritional support which have been made on the label and/or in the labeling in connection with the marketing of the dietary supplement FAMILY ESSENTIALS™ WITH REFERENCE TO ANY CLAIM CONCERNING HAWTHORNE. FAMILY ESSENTIALS™ WITH REFERENCE TO ANY CLAIM CONCERNING HAWTHORNE was first marketed with these statements of nutritional support on Friday, March 6, 1998. The statements of nutritional support are as follows:

Hawthorne (latin name: crataegus laevigata), is a small, shrub-like tree commonly found in Europe, Western Asia and North Africa. In Europe, where Hawthorne is widely used as a heart tonic, standardized extracts of the herb are made from the leaves and flowers.

Vitexin, which is a flavonoid found in concentrated amounts in the leaves and flowers, has been determined through scientific research to be one of the active ingredients responsible for *Hawthorne*'s ability to increase heart muscle efficiency and strength. Family EssentialsTM Today's ManTM contains *Hawthorne* that is standardized to have the vitexin content used in studies. Several of these studies show that *Hawthorne* extracts help patients increase their exercise tolerance through overall improved heart function.

Very truly yours,

MASON VITAMINS, INC.

Sonia C. Rodriguez

VP Marketing & Regulatory Affairs

975 - 0162

LET 1449

[&]quot;Hawthorne has been shown to strengthen the heart muscles and to contain anti-inflammatory properties. It is a valuable addition to any man's daily nutritional program as he ages".

[&]quot;Hawthorne has a history of long term use in helping to strengthen the heart muscles. In addition, its antiinflammatory properties are especially beneficial to mature adults".

[&]quot;Hawthorne the leading herb for heart health in Europe. Is also an anti-inflammatory".

[&]quot;Hawthorne for healthy heart function"

STUDIES FOR HAWTHORNE CLAIMS

Weihmayr T. et al' "Therapeutic Effectiveness of Crataegus" Fortschr Med, 114(1-2):27-29 Jan 20 1996

Tauchert, M., Ploch, M. et al; "Effectiveness of Hawthorn Extract LI 132 Compared with the ACE Inhibitor Captopril: Multicenter double-blind Study with 132 NYHA Stage II" *Munch Med*, 136 (Suppl): S27-S33, 1994

Hanack, T., & Bruckel, M.H. "The Treatment of Mild Stable forms of Angina Pectoris Using Crategutt Novo" *Therapiewoche*, 33: 4331-4333, 1983

Leuchtgens H: "Crataegus Special Extract WS 1442 in NYHA II heat failure. A Placebo Controlled Randomized Double-Blind Study" Fortschr Med, 111(20-21): 352-354 1993 Jul

Schlegelmilch R, Heywood R. "Toxicity of Crataegus (Hawthorn) Extract (WS1442)" J Am Coll Toxic 13: 103-111, 1994

Weiss RF, "Herbal Medicine" Ab Arcanum, Gothenburg, Sweden 1988

Maevers VW, Hensel H. "Changes in Local Myocardial Blood Flow following oral administration of Crataegus Extract to non-anaesthetized dogs" *Arzneim-Forsch Drug Res.* 24: 490-491, 1974

Bahorun T. Trotin F. et al; "Antioxidant Activities of Crataegus Monogyna Extract" Planta Medica, 60: 323-328, 1994

Brown, D.J. "Herbal Prescriptions for Better Health" Prima, Rocklin CA p. 142 1996

Weihmayr T. et al; "Crataegus in Cardiac Insufficiency – Taking a Current Position" *Internist* (Berl), 34(12 Suppl):1-8 Dec 1993

Rajendran S. et al; "Effect of tincture of Crataegus on the LDL-Receptor Activity of Hepatic Plasma Membrane of Rats Fed an Atherogenic Diet" Atherosclerosis, 123(1-2):235-241 Jun 1996

Schussler M. et al; "Functional and Antiischaemic Effects on Monoacetyl-vitexinrhamnoside in Different in Vitro Models" *Gen Pharmacol*, 26(7):1565-1570 Nov 1995

"Efficacy of the *Hawthorne* Preparation LI 132 in 78 patients with chronic congestive heart failure defined as NYHA functional class II" Schmidt, U., Kuhn, U., Ploch, M. *Phytomedficine* Vol. 1/1994 17-24